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Attorneys for Defendants
Republic Mortgage Insurance Company and
Republic Mortgage Insurance Company of North Carolina

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

JPMORGAN CHASE BANK, N.A., :
Plaintiff, : Case No.: 2:10-CV-06141 (WJM) (MF)
v. :
REPUBLIC MORTGAGE :
INSURANCE COMPANY and :
REPUBLIC MORTGAGE :
INSURANCE COMPANY OF :
NORTH CAROLINA, :
Defendants. :
:

TO: **LOWENSTEIN SANDLER, PC**
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and Michael David Lichtenstein

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Attorneys for Plaintiff JPMorgan Chase Bank, N.A.

PLEASE TAKE NOTICE that on July 16, 2012, or as soon as counsel may be heard, Defendants Republic Mortgage Insurance Company and Republic Mortgage Insurance Company of North Carolina, by their counsel Cole, Schotz, Meisel, Forman & Leonard, P.A., shall move before the Honorable William J. Martini, U.S.D.J., at the United States District Court for the District of New Jersey, for entry of an Order enjoining, or in the alternative staying, arbitration.

PLEASE TAKE FURTHER NOTICE that, in support of their motion, Defendants shall rely upon the accompanying Memorandum of Law and Declaration of Albert E. Fowerbaugh, Jr.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order granting the motion is submitted herewith.

PLEASE TAKE FURTHER NOTICE that Defendants respectfully request oral argument pursuant to Local Rule 78.1(b) on the return date of the Motion.

Respectfully submitted,

Dated: June 19, 2012

COLE, SCHOTZ, MEISEL,
FORMAN & LEONARD, P.A.

By: /s/Michael S. Meisel
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CERTIFICATE OF SERVICE

I, Arianna Frankl, hereby certify under penalty of perjury, that on June 19, 2012, I caused a copy of the foregoing NOTICE OF DEFENDANTS' MOTION TO ENJOIN OR STAY ARBITRATION and annexed [PROPOSED] ORDER to be served in accordance with Local Rule 5.2 via electronic means through the Court's ECF filing system on all parties who have appeared in the action.

/s/Arianna Frankl

Arianna Frankl

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